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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CITY OF ALMATY, a foreign state,

Plaintiff,

v.

VIKTOR KHRAPUNOV, an
individual; *et al.*,

Defendants.

Case No.:

Assigned To:

**NOTICE OF RELATED CASES
PURSUANT TO LOCAL RULE 83-1.3**

**TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
RECORD:**

PLEASE TAKE NOTICE THAT the above-captioned action is related to Civil Case No. 2:14-cv-03650-FMO-CW in the District Court for the Central District of California (the “Original Litigation”). The Original Litigation is assigned to the Honorable Fernando M. Olguin.

In the Original Litigation, filed May 13, 2014, Plaintiff the City of Almaty (“Plaintiff” or “Almaty”) seeks to recover assets from certain U.S. Defendants that are being held in the United States and are directly traceable to assets stolen from Almaty by a corrupt former mayor of Almaty, Viktor Khrapunov (“Viktor”), with the assistance of his wife Leila Khrapunov (“Leila”), their children Elvira Khrapunov (“Elvira”) and Iliyas Khrapunov (“Iliyas”), and their respective spouses Dmitri Kudryashov (“Dmitri”) and Madina Ablyazov (“Madina”). The Original Litigation named as defendants Viktor, Leila, Iliyas, Madina, Elvira, Dmitri, and seven U.S. entities created by them to hold and launder the stolen funds: The Kasan Family Trust, for which Elvira and Dmitri serve as trustees, RPM USA, LLC, RPM-MARO LLC, Maro Design, LLC, 628 Holdings, LLC, Candian International Ltd., and Haute Hue, LLC. Following two amendments to the complaint in the Original Litigation and Plaintiff’s ongoing attempt to serve the operative complaint on Viktor, Leila, Iliyas, and Madina, all of whom reside in Switzerland (the “Switzerland Defendants”), on January 16, 2015, the Court in the Original Litigation dismissed the Switzerland Defendants without prejudice. The remaining defendants in the Original Litigation are Elvira and Dmitri – both in their individual capacities and as trustees for the Kasan Family Trust – and the six other U.S. entities. With this new complaint, Almaty seeks to effectuate timely service on the Switzerland Defendants and reclaim the stolen assets they have transferred to and used in the United States in violation of U.S. law.

1 Under Local Rule 83-1.3, actions are related when they appear to “(a)
2 arise from the same or a closely related transaction, happening, or event; (b) call
3 for determination of the same or substantially related or similar questions of law
4 and fact; or (c) for other reasons would entail substantial duplication of labor if
5 heard by different judges.” The Original Litigation and the instant matter both
6 arise under the same set of transactions and call for determination of similar
7 questions of law and fact. Specifically, the Second Amended Complaint in the
8 Original Litigation and the complaint in the instant matter are substantively
9 identical. Further, substantial duplication of effort by the parties and the courts
10 would occur if this matter were not deemed related with the Original Litigation, as
11 a second judge would need to become familiar with the facts and background of
12 this matter. Additionally, this action raises many questions of law identical to
13 those raised in the Original Litigation, and the assignment of the instant action to a
14 different judge creates the possibility of inconsistent rulings. Thus, pursuant to
15 Local Rule 83-1.3, the Original Litigation and the instant matter should be deemed
16 related.

17 Dated: April 8, 2015

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21 By: /s/
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